

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. \_\_\_\_\_

\_\_\_\_\_  
SABRINA DIX-ADAMS,

Plaintiff,

v.

LINDSEY LAPIDES and ANHEUSER  
BUSCH, LLC,

\_\_\_\_\_  
Defendants.

**NOTICE OF REMOVAL**

**TO THE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Pursuant to 28 U.S.C. § 1446(a), Defendants Lindsey Lapides and Anheuser Busch, LLC (“Defendants”), hereby invoke this Court’s jurisdiction under the provisions of 28 U.S.C. §§ 1332 and 1441(a) and state the following grounds for removal:

1. On or about November 30, 2021, Plaintiff Sabrina Dix-Adams filed an action, styled and captioned as above and assigned Civil Action No. 2184CV02730, for alleged negligence against the Defendants in Suffolk County Superior Court. A copy of the Complaint is attached as Exhibit A.
2. Plaintiff purportedly served the Complaint upon Defendant, Anheuser Busch LLC, on or about February 10, 2022. A copy of the Summons is attached as Exhibit B.
3. The Summons and Complaint constitute all process, pleadings, and orders served on Defendant to date in this action. See Exhibits A and B.
4. Having been filed within 30 days of service of the Complaint upon Defendant, this Notice of Removal to the United States District Court has been filed in a timely manner pursuant

to the provisions of 28 U.S.C. § 1446(b). See Murphy Brothers, Inc. v. Michetti Pipe Stringing, Inc., 526 U.S. 344, 347-48, 119 S. Ct. 1322, 1325 (1999).

5. The requirements of 28 U.S.C. § 1446(b)(2) are satisfied where all defendants have joined in removal of this action.
6. Defendants will promptly provide written notice, as required by 28 U.S.C. § 1446(d), to Plaintiff and clerk of the state court in which this case was initially filed.
7. Jurisdiction exists over this removed action, pursuant to 28 U.S.C. § 1441, because this action could originally have been filed in this Court, pursuant to 28 U.S.C. § 1332(a)(1), on the basis that there is complete diversity of citizenship between the adverse parties and the amount in controversy exceeds \$75,000:
  - a. Defendant Lindsey Lapides is an individual domiciled at 9 Bowman Street, Dorchester, Suffolk County, Massachusetts.
  - b. Defendant Anheuser Busch, LLC is a corporate entity with a principal place of business of 1 Busch Place, 2025, St. Louis, Missouri.
  - c. Based on the Complaint, Plaintiff is an individual residing at 23 Blueberry Hill Road, Raymond, New Hampshire. See Exhibit A.
  - d. Plaintiff is claiming that as a result of the Defendants' alleged negligence she "was caused to incur medical expenses, was caused to lose and continues to lose time and income from her employment and has suffered and continues to suffer an impairment to her ability to enjoy life and attend to her usual activities" arising out of a motor vehicle accident at or near Huntington Avenue, Boston, Massachusetts on or about January 24, 2019, involving a motor vehicle operated by Ms. Lapides and owned by Anheuser Busch. See Exhibit A.

- e. The Civil Action Cover Sheet filed by Plaintiff with the Suffolk County Superior Court alleges the Plaintiff “sustained injuries to her head, neck, and left knee requiring surgery.” A copy of the Civil Action Cover Sheet is attached as Exhibit C.
  - f. Plaintiff is claiming that the above-referenced injuries have resulted in hospital, doctor, physical therapy and other medical expenses of approximately \$19,718.11, as well as reasonably anticipated future medical and hospital expenses in excess of \$20,000. See Exhibit C.
  - g. Plaintiff is claiming that as a result of the above-referenced injuries she has incurred documented lost wages and compensation of \$254,795.10 and reasonably anticipated future lost wages in excess of \$50,000. See Exhibit C.
  - h. She has set forth a total claim for \$344,513.21 in damages. See Exhibit C.
8. Pursuant to 28 U.S.C. §§ 101 and 1441(a), the United States District Court for the District of Massachusetts is the proper forum for removal of the state court action which was commenced in the Suffolk County Superior Court in the Commonwealth of Massachusetts.

WHEREFORE, Defendants requests that the action pending in Suffolk County Superior Court be removed therefrom to this Court and proceed as an action properly so removed.

Respectfully submitted,

The Defendants,  
Lindsey Lapidès and Anheuser Busch LLC ,  
By Their Attorneys,

*/s/ Peter A. Monaco*

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Sean J. Milano, BBO #551996  
smilano@morrisonmahoney.com  
Peter A. Monaco, BBO # 681918  
pmonaco@morrisonmahoney.com  
MORRISON MAHONEY LLP  
250 Summer Street  
Boston, MA 02210-1181  
Phone: 617-737-8807  
Fax: 617-342-4938

#### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 24, 2022.

*/s/ Peter A. Monaco*  
Peter A. Monaco